

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>COLONY INSURANCE COMPANY,</b>	)	
	)	
<b>Plaintiff</b>	)	<b>CASE NO. 3:06 cv 555-VPM</b>
	)	
<b>v.</b>	)	
	)	
<b>RONSHABUS GRIFFIN; SOUL INN, INC.; and HPC ENTERTAINMENT GROUP, INC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**INITIAL DISCLOSURES OF DEFENDANT  
HPC ENTERTAINMENT GROUP, INC.**

COMES NOW HPC ENTERTAINMENT GROUP, INC., and makes the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

A. Names, addresses, and telephone numbers of witnesses having discoverable information:

1. Ronshabus Griffin, Tallassee, Alabama.  
Ronshabus Griffin is the Plaintiff.
2. Howard Carter, Tuskegee, Alabama.  
Howard Carter is the principal of HPC Entertainment Group, Inc.
3. Regina Jones, 1147 Hillcrest Road, Adamsville, AL 35005  
Regina Jones was present at the Soul Inn on the evening in question.
4. Jennifer Jordan, Tuskegee Police Department, 1106 Notasulga Road, Tuskegee, Alabama 36083. Telephone: (334) 727-0200.  
Jennifer Jordan was the Tuskegee Police officer who investigated the shooting.
5. Kyla Jones, 1147 Hillcrest Road, Adamsville, AL 35005.  
Telephone: (205) 798-8536.

Kyla Jones was present at the Soul Inn on the evening of the shooting.

6. Shaquetta Penick, 1153 Pebble Creek, Apartment 1, Birmingham, AL 35214.  
Telephone: (205) 447-4099.  
Shaquetta Penick was present at the Soul Inn on the evening of the shooting.
7. Seneca Jones, 1829 43<sup>rd</sup> Street, Birmingham, AL 35208.  
Telephone: (205) 798-7986.  
Seneca Jones was present at the Soul Inn on the evening of the shooting.
8. William O. Kelly, 6801 Court North, Birmingham, AL 35220.  
William O. Kelly was present at the Soul Inn on the evening of the shooting.
9. Justin Williams, Montgomery, AL.  
Justin Williams accompanied Defendant Ronshabus Griffin to the Soul Inn on the evening of the shooting.
10. Kevius Matthews, Weldon Road, Eclectic, AL 36024.  
Kevius Matthews accompanied Defendant Ronshabus Griffin to the Soul Inn on the evening of the shooting.
11. Stacey Brown, Third Avenue, Tallassee, AL 36078.  
Stacey Brown accompanied Defendant Ronshabus Griffin to the Soul Inn on the evening of the shooting.

B. Copies of all documents and tangible evidence:

1. A copy of the Alabama Beverage Control Board's file regarding HPC Entertainment Group, Inc. which was previously submitted to you by Defendant, Ronshabus Griffin in his initial disclosure.
2. Police reports from the Tuskegee Police Department were previously submitted to you by Defendant, Ronshabus Griffen in his initial disclosure.

C. Computation of damages.

This is a declaratory judgment action. The amount of damages, if any, will be determined in the underlying State Court action.

D. Insurance agreements.

The Defendant has already produced a copy of the insurance policy which is the subject of this action.

/s/ Albert C. Bulls IIIU  
ALBERT C. BULLS III (BUL009)  
Attorney for Defendant HPC Entertainment  
Group, Inc.

OF COUNSEL:  
Albert C. Bulls III, P.C.  
Attorneys at Law  
P.O. Box 1233  
2801 Althea Street  
Tuskegee, Alabama 36088  
334.727.1074  
Fax: 334.727.1639  
(Email) [acbulls@charter.net](mailto:acbulls@charter.net)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on the following  
counsel of record by mailing a copy thereof, postage prepaid, to them at their proper  
mailing address on this the 18<sup>th</sup> day of December 2006.

Algert S. Agricola, Esq.  
Jason J. Baird, Esq.  
SLATEN & O'CONNOR, P.C.  
Winter Loeb Building  
105 Tallapoosa Street  
Suite 101  
Montgomery, Alabama 36104

John I. Cottle  
Attorney at Law  
P. O. Box 780397  
Tallassee, Alabama 36078

/s/ Albert C. Bulls III  
ALBERT C. BULLS III